



## **HAZARDOUS AND SOLID WASTE AMENDMENTS**

### **PERMIT RENEWAL WITH MODIFICATIONS FACT SHEET**

**HOLCIM (US) INC./GEOCYCLE LLC  
HOLLY HILL, SOUTH CAROLINA  
EPA ID NUMBER: SCD 003 368 891**

#### **INTRODUCTION**

This Hazardous and Solid Waste Amendments (HSWA) Permit Fact Sheet (Fact Sheet) is prepared for a modification to, and a renewal of, the initial HSWA Permit developed by the U.S. Environmental Protection Agency, Region 4 (EPA Region 4) for the Holcim (US) Inc./Geocycle LLC facility. Holcim (US) Inc. and Orangeburg County, South Carolina own the property on which the facility is located. Geocycle LLC is the operator of the facility. The Holcim/Geocycle facility is located at 200 Safety Street/Highway 453, Holly Hill, South Carolina 29059. The EPA ID number for this facility is SCD 003 368 891.

This Fact Sheet sets forth the principal facts and proposed modifications to the ten (10) year HSWA Permit renewal.

#### **PERMIT PUBLIC NOTICE**

This Fact Sheet was developed by EPA Region 4 in order to invite the public to comment on the proposed permit modification to, and renewal of, the HSWA Permit originally issued on March 22, 1990 and last renewed on March 21, 2003. The subsequent permit expired on March 21, 2013, but was administratively continued because a renewal application was timely submitted. This proposed HSWA Permit is a companion permit to the 2013 Hazardous Waste Management Permit that was renewed by the South Carolina Department of Health and Environmental Control (SCDHEC) on April 16, 2013 with an expiration date of April 16, 2023 (2013 SCDHEC HWM Permit). Together, these two permits constitute the full Resource Conservation and Recovery Act (RCRA) Permit for this facility. This proposed HSWA Permit for the Holcim/Geocycle facility, once finalized, will be renewed for a ten (10) year period. This proposed HSWA Permit is consistent with the 2003 HSWA Permit for the facility with the following modifications:

1. The construction of a new hazardous waste handling portion of the precalciner portion of the industrial furnace system (also known as the "Portland cement kiln system") to allow the continuing treatment of hazardous waste derived fuel (HWDF) in one industrial

furnace system, but at two locations within the system: at the preheater/precalciner tower and at the lower (hot) end of the rotary kiln, with continued use of the direct burn system;

2. The removal of paragraph III.P (Closure of Wet Process Kilns) from the initial HSWA Permit because the Permittee has closed the two wet process Portland cement kilns under an approved closure plan; and
3. The removal of portions of Part III of the initial HSWA Permit that primarily pertain to the operation and performance of the Portland cement kiln system that are duplicative of the requirements promulgated under the authority of 40.CFR. Part 63, Subpart EEE, the “National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustor,” which are now regulated under Holcim/Geocycle’s Title V Operating Permit (TV-1860-0005).
4. The addition of Orangeburg County as an owner as a result of a fee in lieu of tax (FILOT) arrangement with Holcim.

This proposed HSWA Permit does not allow any increase in the permitted feed rate of HWDF to the kiln system. The Permittee will conduct a Comprehensive Performance Test (CPT) of the new hazardous waste handling system, similar to a trial burn. The CPT will determine whether the air emissions from the modified system continue to comply with Maximum Achievable Control Technology (MACT) standards for hazardous air pollutants.

EPA Region 4 is soliciting all relevant information pertaining to this permit renewal and modification, including public comment, to ensure that the proposed HSWA Permit complies with all state and federal regulations. Public review and comment on the proposed HSWA Permit and supporting documentation is an important element in the evaluation and resulting recommendation to the EPA Region 4 RCRA Division Director. The proposed modification and renewal of the HSWA Permit is subject to change based on information received as a result of public participation. Any and all comments are encouraged by the public.

The public comment period for the proposed HSWA Permit will begin on December 5, 2014, and end sixty (60) days thereafter on February 2, 2015. Persons wishing to comment upon the proposed HSWA Permit are invited to submit comments in writing to Mr. Robert Morris at the address shown below NO LATER THAN February 2, 2015.

Mr. Robert Morris  
USEPA Region 4  
61 Forsyth Street, S.W.  
Atlanta, GA 30303  
(404) 562-8470

A proposal has also been made for a Class 3 modification to the 2013 SCDHEC HWM Permit (hereinafter “Class 3 modification”) to incorporate the changes referenced above. SCDHEC has prepared a separate Fact Sheet and is soliciting public comment on the draft Class 3 modification. EPA and SCDHEC have coordinated, and together are initiating the public comment period for both proposed permits.

EPA and SCDHEC have placed a public notice in *The State* newspaper, also announcing the beginning of the public comment period. EPA will accept comments on the proposed HSWA Permit and SCDHEC will accept comments on the draft Class 3 modification to the 2013 SCDHEC HWM Permit. Please direct all comments on the draft Class 3 modification to the 2013 SCDHEC HWM Permit to SCDHEC, as directed in the Public Notice and Fact Sheet issued by SCDHEC.

During the public comment period, any interested person may request, in writing, a public hearing. The request for a public hearing must state the nature of the issues proposed to be raised in the hearing.

EPA and SCDHEC will hold a joint public information availability meeting to discuss both of the proposed permits with interested citizens. The public meeting will be held on **January 27, 2015 from 6:00 p.m. to 8:00 p.m.**, at the Holly Hill Depot located at 8603 Old State Road in Holly Hill, SC. Directions may be obtained by calling The Town of Holly Hill at (803) 496-3330. Interested persons may come by at any time during this public information availability meeting to ask questions or discuss concerns about the draft permits.

After consideration of all written and oral comments received during the public comment period, EPA Region 4 will make a decision regarding the HSWA Permit Modification. All persons submitting comments will be notified by EPA of the final HSWA permit actions.

This Fact Sheet, proposed HSWA Permit, and other supporting technical documents are available during normal business hours at the above EPA address (contact: Mr. Robert Morris) or at the below SCDHEC locations:

SC DHEC  
Bureau of Land and Waste Management  
2600 Bull Street  
Columbia, SC 29201  
Phone: (803) 898-2000

SC DHEC  
Midlands EQC Aiken  
206 Beaufort Street, NE  
Aiken, SC 29801  
Phone: (803) 642-1637

SC DHEC  
Lowcountry EQC Charleston – McMillan  
1362 McMillan Avenue, Suite 300  
Charleston, SC 29405  
Phone: (843) 953-0150

This Fact Sheet and proposed HSWA Permit can be viewed on EPA Region 4's website at:

[www.epa.gov/region4/rcra/PublicNotices.htm#haz](http://www.epa.gov/region4/rcra/PublicNotices.htm#haz)

## **FACILITY BACKGROUND**

### **Facility Description**

The Holcim/Geocycle facility is located in Orangeburg County, south of the town of Holly Hill, South Carolina, at 200 Safety Street, Highway 453, as depicted in Figures 1 and 2. Holcim and Orangeburg County own approximately 3700 acres of land at the location where the facility is operated, with Holcim owning a vast majority of the land. See Figures 1 and 2.

Since 1987, Holcim/Geocycle has used liquid HWDF for energy recovery in its cement production facility. The HWDF is used as a supplement fuel to replace fossil fuels and is burned to recover energy that is used for the manufacturing of cement clinker. HWDF is a blend of various waste solvents, oils, out-of-specification intermediates, and products from various industries such as paints, inks, adhesives, resins, plastics, petroleum, petrochemical, pharmaceutical, automotive, and numerous chemical manufacturing and process industries.

In October 2011, Holcim/Geocycle proposed adding the treatment of liquid hazardous wastes to the precalciner portion of the permitted industrial furnace (aka Portland cement kiln system). The precalciner portion of the combustion unit currently uses non-hazardous liquid and solid wastes for energy recovery. The facility already has approval to use HWDF for energy recovery in the lower (hot) end of the rotary kiln portion of the Portland cement kiln system. The proposal is based on there being no increase in the permitted HWDF feed rate (149,000 short tons/year) to the Portland cement kiln system. Separate approval from SC DHEC's Bureau of Air Quality (BAQ) is also required before construction can begin. This separate approval was granted by BAQ by issuance of Construction Permit No. 1860-0005-DO in 2012.

### **Regulatory History**

EPA originally issued the HSWA portion of the RCRA Permit, which included the BIF requirements for the wet process Portland cement Kiln system and the ancillary hazardous waste feed equipment, to Holnam/Safety Kleen Corporation on March 22, 1990. EPA renewed the RCRA HSWA Permit on March 21, 2003. The 2003 RCRA HSWA Permit expired on March 21, 2013, but was administratively continued because a renewal application was timely submitted. SCDHEC renewed the HWM Permit on April 16, 2013 with an expiration date of April 16, 2023. EPA is proposing to renew the Holcim/Geocycle HSWA Permit. Concurrently, SCDHEC is proposing to approve Holcim/Geocycle's Class 3 modification request to its 2013 SCDHEC HWM Permit.

Attached are Figures 1 and 2, depicting the facility location and property boundaries.



FIGURE 1  
Facility Boundary Map

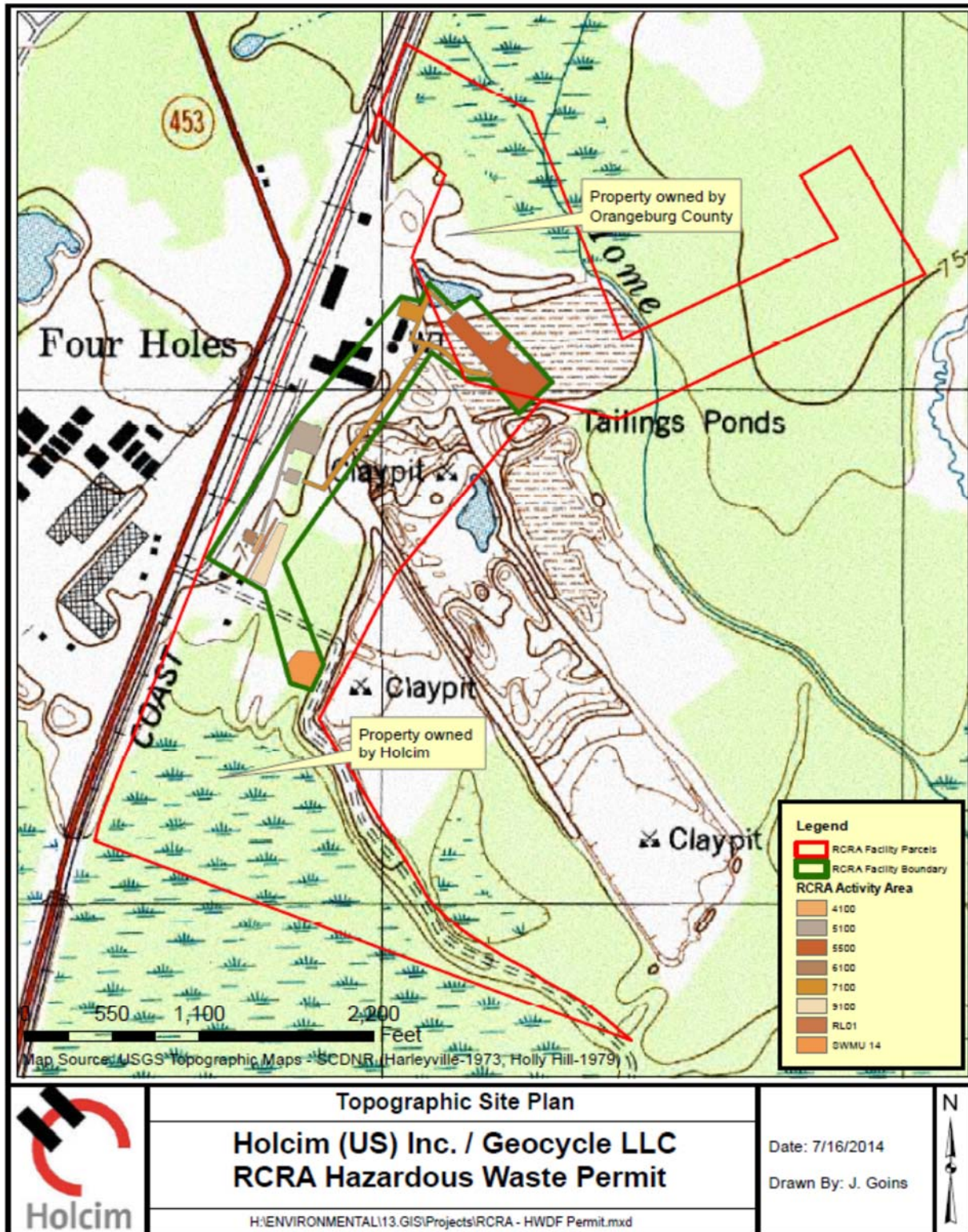




FIGURE 2  
Facility Property Map

